

2018R00439/LG

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. *Esther Soles*  
: :  
v. : Criminal No. 20- *189*  
: :  
VICTORIA IRIZARRY : 21 U.S.C. § 846  
: 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)  
: 18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by indictment,  
the United States Attorney for the District of New Jersey charges:

COUNT ONE  
*(Conspiracy to Distribute Cocaine)*

From in or around August 2018 through in or around November 2018, in  
Essex County, in the District of New Jersey, and elsewhere, the defendant,

VICTORIA IRIZARRY,

did knowingly and intentionally conspire and agree with others to distribute  
and possess with intent to distribute 500 grams or more of a mixture and  
substance containing a detectable amount of cocaine, a Schedule II controlled  
substance, contrary to Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(B).

In violation of Title 21, United States Code, Section 846.

COUNT TWO  
*(Possession with Intent to Distribute Cocaine)*

From in or around August 2018 through in or around November 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

VICTORIA IRIZARRY,

did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

As a result of committing the controlled substance offenses in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and 846, as charged in Counts One and Two of this Information, the defendant,

VICTORIA IRIZARRY,

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Counts One and Two of this Information.

Substitute Assets Provision

If by any act or omission of the defendant any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), to forfeiture of any other property of the defendant up to the

value of the above-described forfeitable property.

  
Craig Carpenito  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 20-

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

v.

**VICTORIA IRIZARRY**

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**INFORMATION FOR**

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21 U.S.C. § 846  
21 U.S.C. §§ 841(a)(1), (b)(1)(B)  
18 U.S.C. § 2

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**CRAIG CARPENITO**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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ASSISTANT U.S. ATTORNEY  
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